

ORIGINAL

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

06 CV 0589 (GEL)

MADISON SQUARE GARDEN, L.P.,  
ISTIAH LORD THOMAS III and JAMES L. DOLAN,

Defendants.

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VIDEOTAPED DEPOSITION OF ANUCHA BROWNE SANDERS

New York, New York

Tuesday, November 28, 2006

REPORTED BY:

BARBARA R. ZELTMAN

JOB NO.: 10957



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2 A People left the Garden.

3 People came in, yes.

4 Q Did people leave voluntarily  
5 or involuntarily or was it a combination  
6 of the two?

7 MS. VLADECK: Objection to  
8 form.

9 A Most people left voluntarily.  
10 Outside of the layoffs some people left --

11 Q Did any --

12 MS. VLADECK: Sorry. Were you  
13 finished?

14 A Most people left voluntarily.  
15 Some people were laid off and then I think  
16 there were a few that were fired.

17 Q Did Eddie Oliva leave?

18 A Yes.

19 Q And can you tell us what his  
20 position was and when he left?

21 A I think he was a director  
22 level basketball operations/community  
23 relations.

24 Q Forgive me, but how does  
25 director level fit in the organizational

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2 structure with respect to vice presidents  
3 and senior vice presidents?

4                   A         Starting from senior vice  
5     president being the highest ranking, the  
6     vice president is below that, director is  
7     below that, manager and then assistant.

8 Q Thank you.

9 So who did Mr. Eddie Oliva  
10 report to when he was a director and left?

11 A He reported directly to me.

12 Q And you would have been vice  
13 president?

14                   A        Was I vice president? I don't  
15 know if I was vice president or senior  
16 vice president at that point. I'm not  
17 sure of the exact --

18 Q Wouldn't a director -- I'm  
19 sorry.

20                   Wouldn't a director report to  
21 a vice president and vice president report  
22 to a senior vice president?

23 A No, not necessarily. I had  
24 directors reporting directly to me

25 Q When did Mr. Oliva leave do

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2 directly into basketball operations and  
3 not community relations or marketing.

4 Q And why was that a problem?

5 MS. VLADECK: Objection to  
6 form.

7 A Because that wasn't his  
8 assigned position. His assigned position,  
9 as stated by Steve Mills, was that he  
10 would be working in my department within  
11 community relations.

12 Q Do you know if a reason for  
13 his wanting to report in to basketball  
14 operations was because he didn't want to  
15 report to you?

16 A No. His reasons for wanting  
17 to report in to basketball operations was  
18 because he felt that the majority of his  
19 function is -- his job function was  
20 basketball-operations focused.

21 Q And did Peter Fagan also  
22 leave?

23 A Yes, he did.

24 Q Can you tell us what his title  
25 was and what his job was and when he left?

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2 and took me aside and said, "I want to  
3 talk to you about [REDACTED]"

4 He proceeded to tell me that  
5 he mentioned to [REDACTED] that they had money  
6 set aside to hire somebody in a consulting  
7 role to help them with the [REDACTED]

8 [REDACTED] He said  
9 that [REDACTED] then said that she wanted to do  
10 that. And he asked her, "Well, you are  
11 doing that -- you're working for the  
12 company, how can you work for the company  
13 and also do this program for me on a  
14 consulting basis?"

15 And she said, "I've done it on  
16 other programs." That was relayed to me.  
17 I came back and I relayed that to Steve  
18 and he asked me to -- I don't remember who  
19 at the time I spoke to in HR, who he  
20 directed me to. And she was fired.

21 Q Did Mr. Mills offer any  
22 resistance to her being terminated?

23 MS. VLADECK: Objection to  
24 form.

25 A [REDACTED] had numerous performance